

## **REMARKS**

### **Rejections under 35 U.S.C. § 103**

On page 2 of the Office Action, the Examiner has rejected claims 1-36 under 35 U.S.C. § 103(a) as being unpatentable over U.S. patent no. 5,820,459 to Acres et al. in view of IEEE-1394: An Emerging Interconnection System for Future Simulations and Creating One Industry Standard for Manufactures of Electronic Games of Chance (IEEE-1394).

Applicant respectfully traverses the rejections. Applicant respectfully submits that the combination of these references is not proper, as the references do not provide a motivation to combine them. Even if properly combined, the combination does not render the claims obvious. At the outset, there is no motivation within the references to combine them. Acres et al. discloses a system and method for operating a plurality of gaming machines 22, 24, 26 connected to an associated floor controller 28 over a network. The floor controller can be connected to a series of microcontrollers in a daisy chain configuration shown in Fig. 12, wherein each microcontroller 248A-248H is, in turn, connected to a plurality of gaming machines over current loop networks, wherein each microcontroller can support two current loop networks, wherein each such current loop network can support up to 64 gaming machines (see column 19, lines 11-21 and 41-42). Specifically, this construction allows for improved player tracking by recording each and every machine transaction including time of play, machine number, duration of play, coins in, coins out, hand paid jackpots and games played.

The present invention differs fundamentally from the Acres et al. system in that it is directed to a system of a plurality of devices communicating with a host controller through a plurality of local controllers or nodes, wherein the devices may be located in a

single gaming machine (see claim 12). In other words, the devices being controlled are not gaming machines themselves, but parts of gaming machines, such as individual switches, lights and the like. This is fundamentally different from the arrangement of Acres et al.

The Examiner states that it would be obvious to take the system of Acres et al. with the interconnection scheme of IEEE-1394 to arrive at Applicants' invention (Office Action, pages 2-3). However, there is no motivation to seek an improvement in the system of Acres et al., which discloses system elements that are interconnected over an industry standard Ethernet network (column 7, lines 45-49). An Ethernet network does not supply power and ground to the devices on the network. In particular, Acres et al. fails to disclose the provision of power or ground to the controlled devices of the network, since each of the devices (gaming machines) will be powered locally. Thus, there is no motivation to combine the system of Acres et al. with the interconnection scheme of IEEE-1394, which requires that a connected device be within 4.5 meters of the bus socket (see Figure 9 of IEEE-1394, Cabling and Power), as the combination would result in a system that is contrary to the disclosure of Acres et al. to have a plurality of gaming devices and floor controllers interconnected with a high-speed network and arranged throughout a casino. Employing the interconnection scheme of IEEE-1394 in place of Acres et al.'s preferred high speed network Ethernet connection would limit placement of the interconnected devices to within 4.5 meters of their respective bus sockets, significantly restricting the number and placement of such devices. Furthermore, Acres et al. teaches away from such restrictions on device positioning, stating that "other high-speed networks such as wireless networks could be

used in place" of an Ethernet network (see column 37, lines 54-56). Therefore, these references teach away from combining them.

Further, Applicants submit that the system of Acres et al. fails to provide an enabling disclosure for power terminals and common terminals, and does not provide sufficient disclosure for providing a power line interconnecting the power terminals of the host controller and all of the local controllers and a common line interconnecting the common terminals of the host controller and all of the local controllers. Applicants' invention, specifically the combined provision of power and ground connections to each of the accessed devices in the claimed invention, is important, since these devices may be devices such as switches or lamps within an individual gaming machine, shows a dramatically improved gaming system when compared with the system disclosed in Acres et al. This is described in the specific limitations of the independent claims of the subject application. Each of independent claims 1 and 5 specifies a gaming system comprising a plurality of devices to be individually accessed, a host controller and a plurality of local controllers interconnected with the host controller in a string, wherein each controller has a "power terminal" and a "common terminal," and further including a "power line interconnecting the power terminals of the host controller and all of the local controllers" and "a common line interconnecting the common terminals of the host controller and all of the local controllers." Claim 31, similarly recites a method of individually accessing a plurality of devices in a gaming system including local controllers and a host controller and including "providing a power line connected to all of the controllers and a common line connected to all of the controllers." No such arrangement is disclosed or suggested by Acres et al.

Even if these references were properly combinable, Acres et al. alone or in combination with IEEE-1394 does not disclose or render obvious Applicants' invention. Specifically, this combination of references and the reasons given by the Examiner for the combination do not disclose what is required by the Applicants' claims – a gaming system comprising a plurality of devices to be individually accessed, a host controller and a plurality of local controllers interconnected with the host controller in a string, wherein each controller has a "power terminal" and a "common terminal," and further including a "power line interconnecting the power terminals of the host controller and all of the local controllers" and "a common line interconnecting the common terminals of the host controller and all of the local controllers." This combination also does not teach or suggest a system expressly or inherently having the claimed requirements of Applicants' gaming system. It is advantageous to provide a gaming system that provides power and ground connections to each of the accessed devices in the claimed invention. One advantage to using the power and ground connections of the present invention is that accessed devices, such as switches or lamps within an individual gaming machine, can be controlled. The system of Acres et al. could not be used to provide a controller that has a "power terminal" and a "common terminal," and further including a "power line interconnecting the power terminals of the host controller and all of the local controllers" and "a common line interconnecting the common terminals of the host controller and all of the local controllers." Thus the system of Acres et al. is unsuitable.

The Examiner has failed to establish a prima facie case for obviousness of claims 1-36. It is the Examiner's burden to show that the prior art relied upon coupled


with the knowledge generally available in the art at the time of the invention must contain a suggestion or incentive that would have motivated one of ordinary skill in the art to combine references. As Applicants' have set forth throughout this response, the distinctive differences between the individual references makes the combination of these references implausible. The Examiner must also show that the proposed combination must have a reasonable expectation of success. It is inappropriate for the Examiner to use the present application as a motivation to combine the references. This inappropriate combination, taking bits and pieces from each reference in an attempt to create Applicants' invention, is exactly what the Examiner has done with these references.

Therefore, since Acres et al., in view of IEEE-1394 fails to teach or disclose a controller that has a "power terminal" and a "common terminal," and further including a "power line interconnecting the power terminals of the host controller and all of the local controllers" and "a common line interconnecting the common terminals of the host controller and all of the local controllers," Applicants respectfully submit it does not anticipate or render obvious any of the pending claims.

Accordingly, it is believed that each of claims 1-36 are patentable over Acres et al. Applicants respectfully request reconsideration and withdrawal of the § 103 rejection as to these claims and that the application be allowed.

Respectfully submitted,

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